



**U.S. Department of Justice
Office of the United States Trustee
Western District of Washington**

700 Stewart Street, Suite 5103
Seattle, WA 98101-1271

(206) 553-2000
(206) 553-2566 (fax)

December 15, 2021

VIA CM/ECF FILING SYSTEM

Honorable Mary Jo Heston
United States Bankruptcy Court for the W.D. of Washington
Tacoma Federal Courthouse Union Station
1717 Pacific Avenue, Ste 2100
Tacoma, WA 98402-3233

Re: United States v. McAvity, et al, Case No. 20-00400

Dear Judge Heston,

Since the December 2, 2021, prior hearing on the Order Approving Stipulation, the parties have been working to revise the Order Approving Stipulation in accord with the Court's comments. All issues have been resolved between the parties with mutually agreeable language (see Paragraphs 10, 12-14), other than one. In accordance with the Court's comments, the U.S. Trustee had added language that the Clerk of Court shall close the ECF accounts related to Mr. McAvity as of March 31, 2022. This has raised an issue about who and how Mr. McAvity make see fee awards for work done through the entry of the Order Approving Stipulation.

The U.S. Trustee's position is that Mr. McAvity or Northwest Debt Relief Law Firm may seek fees for any work done in any bankruptcy case through the date of the entry of the Order Approving Stipulation by a properly filed and noticed fee application, set to be heard before March 31, 2022. Mr. McAvity would prefer that Mr. Ditton include any fees billed by himself or Northwest Debt Relief Law Firm in Mr. Ditton's final fee application in those cases where Mr. Ditton has substituted, and Mr. Ditton be treated as a continuation of the current representation.

The parties are prepared to address this issue before the Court at the hearing set tomorrow, but we wished to give you a preview of where things stand in advance of that.

December 15, 2021

Page 2

Sincerely,

Matthew J.P. Johnson

/s/ Matthew J.P. Johnson

Trial Attorney for the United States Trustee

Matthew.j.johnson@usdoj.gov

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